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February 5, 1992

Dennis Smith, EG&G  
Scott Grace, DOE/RFO  
Rocky Flats Plant  
Golden, Colorado 80402

Dear Messrs Smith and Grace:

This letter is provided as confirmation of my comments and our discussions held on January 28, 1992 with representatives of US EPA, US DOE, EG&G and their contractors, the Colorado Department of Health, and the Natural Resources Trustees on OU1 surficial soil and sediment sampling and analysis work plan. The following provides only the comments of substance and not those of an editorial or typographical nature.

Page 1-20 Table 1-3 identifies that VOCs are not to be included in the Surface S-SCAR (see footnote (3)). The statement is that "it is expected these compound(s) would have volatilized ..." without substantiating references or documentation contrary to the required NQA-1 documentation. These materials persist in the environment and have for quite an extended period of time. Confirmatory samples (properly taken and analysed) are needed to support the currently undocumented suppositions.

Page 1-22 Analyte Class III Volatile Organics statement again makes the unsubstantiated statement about "they are not expected to be present in detectable quantities". Same concerns as stated above.

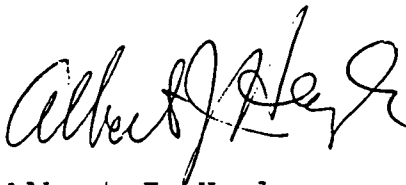
Page 2-1 The last two (2) sentences of the second paragraph should be corrected to read as follows for the statements to be true: "The State of Colorado requires special techniques of construction on lands with plutonium concentrations greater than 2.0 dpm/g (0.9 pCi/g) of dry soil. To evaluate the soil-plutonium values relative to this standard, the CDH soil sampling protocol for evaluating large tracts of land remote from the source of contamination was used."

Page 2-6 through 2-14 (the modified RF soil sampling methodology), because of the general applicability of the state plutonium soil standard to this site (should it ever become an uncontrolled area for the purposes of radiation protection and control) the soil sampling in question must be relevant to the standard in question. Do to the number of samples and the number of analytes, the sampling methodology must be adequate to address the greatest number of needs. Because of this, my comments at the meeting were to the effect that the modified Rocky Flats soil sampling methodology could be used for the plutonium contamination evaluation based on the surface area (uCi/sq meter) of the samples collected, rather than on a mass basis (pCi/g). Both equivalents are provided in the state soil standard. CDH data to date have not identified any correlation between the 1/4" and 2" deep surficial soil samples, but the deeper sample would provide a more conservative (protective) assessment although the degree of conservatism cannot be specified. But at least that way it is perceived that the many needs of this work plan could be addressed with one sampling technique.

Again I would suggest that the sampling plan include the information discussed but not included in the draft document be included.

I have provided these comments in writing at this time as a result of the lack of further discussion ("we'll get back in touch with you") and the timeframe needs of this effort.

Sincerely,



Albert J. Hazle  
Natural Resources Trustee (soils)  
Supervising Health Physicist  
Rocky Flats Program Unit

cc: J. Schieffelin, HMWMD  
B. Barry, RFPU